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6 Attorneys for Plaintiff
De Sol Corp., Inc.
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 (Oakland Division)

11 De Sol Corp., Inc., a California corporation,

12 Plaintiff,

13 vs.

14 Vegas Connection, Inc., a California
corporation; Omar Awad, an individual;
15 Jahangir Shahriari, an individual,

16 Defendants.
17
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Case No. C07 4107 SBA

**PLAINTIFF'S NOTICE OF MOTION
AND MOTION TO REOPEN CASE
AFTER REPORTED SETTLEMENT**

**Hearing Date: February 12, 2008
Time: 1:00 p.m.
Dept.: 3**

19 TO EACH DEFENDANT AND THEIR ATTORNEYS OF RECORD HEREIN,
20 NOTICE IS HEREBY GIVEN

21 That Plaintiff De Sol Corp. will and hereby does, move this Court to reopen the above-
22 entitled action and set the action for further Case Management, trial, or another appropriate
23 status conference or hearing as the Court deems proper, on the following grounds:

24 On or about December 13, 2007, Plaintiff De Sol Corp. and Defendants Vegas
25 Connection, Inc., Omar Awad, and Jahangir Shahriari reached a tentative settlement in the
26 above-entitled action.
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1 Defendants' attorney John Richards reported the tentative settlement to the Court at that
2 time and the Court issued its Order dated December 13, 2007, dismissing the action with
3 prejudice. The Court's Order indicated that any party could move to reopen the case within 30
4 days if the case in fact did not settle as reported. The parties' tentative settlement is still in place,
5 but the parties are still in the process of working out the details and preparing all necessary
6 settlement documents. Accordingly, as the 30 day timeline in the Court's Order has expired or is
7 about to expire, Plaintiff respectfully requests that the Court reopen this case in light of the fact
8 that the action has not officially settled.

9 Said motion is based on this notice of motion, the Declaration of Brandon L. Reeves filed
10 concurrently herewith in support of the motion, the Court's Order dated December 13, 2007, and
11 on any other such oral or documentary evidence as may be heard at the hearing of this motion.

12
13 DATED: January 11, 2008

GREENE, CHAUVEL, DESCALSO & MINOLETTI

14 *Brandon L. Reeves*

15 BY: _____
16 RONALD C. CHAUVEL
17 BRANDON L. REEVES
18 Attorneys for Plaintiff
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